

### **REMARKS**

No claims have been added or cancelled. Claims 25 and 37 have been amended.  
Hence, Claims 25-49 are currently pending in the application.

### **SUMMARY OF THE REJECTIONS**

Claims 25-49 are rejected under 35 U.S.C. § 102(a) as allegedly being anticipated by Ladd, Eric, et al., Using HTML 4, XML, and Java 1.2, 1999, Que. Platinum Edition (hereinafter "*Ladd*"). Claims 32 and 44 are rejected under 35 U.S.C. § 103(a) as allegedly being obvious in view of *Ladd*.

The rejections are respectfully traversed.

### **LADD DOES NOT SUGGEST EACH ELEMENT OF THE AMENDED CLAIMS**

Each of Claims 25-49 is patentable over the cited art because at least one element in each pending claim is not disclosed, taught, or suggested by the cited art.

Claim 25 recites:

“storing a preconstructed web page;  
storing, separate from said preconstructed web page, correlation data  
that specifies a correlation between an identifier and  
replacement content;  
receiving a request for a requested web page that corresponds to said  
preconstructed web page;  
in response to said request, retrieving said preconstructed web page,  
wherein:  
said preconstructed web page was created prior to receiving said  
request,  
said preconstructed web page is written in a tag-delimited page  
description language, and  
said preconstructed web page includes said identifier that is located at a  
position between a pair of tags within said preconstructed web  
page;  
in response to said request, modifying said preconstructed web page to  
produce said requested web page by causing a program to  
perform the steps of:  
removing said identifier from said preconstructed web page, and  
inserting said replacement content at said position in said

preconstructed web page, wherein said replacement content is selected based on the correlation data; and  
providing said requested web page in response to said request.”

Both *Ladd* and the pending claims are directed towards generating a web page, and both *Ladd* and the pending claims perform operations that modify a web page in response to receiving a request for a web page. However, beyond these generalities, there are sharp contrasts between the approach of *Ladd* and the approach recited in the pending claims.

In the approach of *Ladd*, when the server receives a request for the web page, the server may execute a script embedded in the web page. The script may modify the content of the web page. For example, if a client requested the web page shown on page 851, then the server would execute the embedded VBScript entitled ‘HelloWorld,’ which would generate the text “Hello World.” The text “Hello World” would appear in the requested web page served to the client, but the embedded VBScript would not.

Unfortunately, the approach of *Ladd* suffers from exactly the same deficiencies that were described in the Applicants’ background (see page 3, lines 5-16 of the Applicants’ specification). Specifically, the application logic and user interface of the web page are not cleanly separated, which causes difficulties for programmers and Web page artists who are simultaneously working on the same web page.

Advantageously, the approach taken by the pending claims solves the problems experienced by *Ladd*. In the approach of the pending claims, correlation data that specifies a correlation between an identifier and replacement content is stored separate from the preconstructed web page. The replacement content, identified by the correlation data, is inserted into the preconstructed web page at a position identified by an identifier. Because the correlation data is stored separate from the preconstructed web page, the problems associated with the approach of *Ladd* are avoided.

In view of the differences between *Ladd* and the approach of the pending claims, numerous elements featured in Claim 25 are not disclosed, taught, or suggested by *Ladd*. No portion of *Ladd* teaches, discloses, or suggests the element of “storing, separate from said preconstructed web page, correlation data that specifies a correlation between an identifier and replacement content” as featured in Claim 25. On the contrary, *Ladd* expressly teaches away from this element as the approach of *Ladd* stores all code that modifies web page content in

the actual web page itself, e.g., the script "HelloWorld" is contained within a particular web page, and when the particular web page is requested, the script "HelloWorld" is executed.

Further, no portion of *Ladd* teaches, discloses, or suggests the element of "inserting said replacement content at said position in said preconstructed web page, wherein said replacement content is selected based on the correlation data" as featured in Claim 25. In sharp contrast, to the extent that content is inserted into a web page in the approach of *Ladd*, the modified content is generated by execution of embedded VBScript within the web page, and not by correlation data stored separate by the preconfigured web page.

Consequently, as at least one element is not shown, taught, or suggested by the cited art, it is respectfully submitted that Claim 25 is patentable over the cited art, and is in condition for allowance. Claims 26-49 contain elements similar to those discussed above with respect to Claim 25. Thus, Claims 26-49 are also in condition for allowance for at least the same reasons as given above for Claim 25.

### CONCLUSION

The Applicants believe that all issues raised in the Office Action have been addressed and that allowance of the pending claims is appropriate. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

To the extent necessary to make this reply timely filed, the Applicant petitions for an extension of time under 37 C.F.R. § 1.136.

If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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